Message

From: Armann, Steve [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0E0EA7A009D4D75BC7BEA58747CCF9E-SARMANN]
Sent: 11/3/2015 2:21:49 PM
To: Lofstrom, Dot@DTSC [Dot.Lofstrom@dtsc.ca.gov]
Subject: FW: Questions re: testing at Riverside site

FYI, our response to press inquiry....

Steven S. Armann, Manager
Corrective Action Office (LND-4-1)
USEPA Region 9
75 Hawthorne Street
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Email: armann.steve@epa.gov

From: Huetteman, Tom
Sent: Monday, November 02, 2015 4:05 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Cc: ZIFF, SARA <ZIFF.SARA@EPA.GOV>; Wilson, Patrick <Wilson.Patrick@epa.gov>; Baylor, Katherine <Baylor.Katherine@epa.gov>; Beach, John <Beach.John@epa.gov>; Armann, Steve <Armann.Steve@epa.gov>
Subject: RE: Questions re: testing at Riverside site

See responses below.

Tom Huetteman, Assistant Director
Land Division, USEPA Region 9
415-972-3751

Begin forwarded message:

> **From:** Alicia Robinson <arobinson@pe.com>
> **Date:** November 2, 2015 at 12:11:29 PM PST
> **To:** "Mogharabi, Nahal" <MOGHARABI.NAHAL@EPA.GOV>
> **Subject: Re: Questions re: testing at Riverside site**
>
> Thanks Nahal. Here are a few of my questions for starters - I'd still like to talk to someone, because this isn't my area of expertise and I want to make sure I understand the data correctly, so please let me know when someone will be reachable.
>
> First, what is the percent of organic carbon in the soil? The report doesn't mention it (I have asked a soil contamination expert to help me interpret the report, and this was his question).
>
> We don't know the organic carbon content of the soil. Organic carbon is often an issue associated with the bioavailability of PCBs. However, in this case, EPA is not evaluating bioavailability with these tests and we would normally not do so.

Also, am I correct in my reading that 16 of the 19 samples EPA tested showed elevated levels of PCBs? If so, was that unexpected or is it unusual for a site that has already been remediated?

Yes, the EPA samples show the presences of PCBs in the soils. It is common for remediated sites to have residual contamination. See response below.

What was the threshold or standard for when a result is too high? (As a made-up example, if the threshold was 5 parts per million, then any result above that - 5.1 ppm, 17 ppm, 200 ppm, etc. - would exceed the standard.) Does EPA have a rule for the level of PCBs in soil at which they become a human health hazard?

EPA and DTSC use a "risk based" approach to cleaning up contaminated sites. To guide a cleanup project we will often use screening levels as cleanup goals. Once cleanups are complete, the lead regulatory agency or the project proponent, with agency oversight, will conduct a risk assessment to determine if the site is acceptable for the intended purpose. At the former Riverside Agricultural Park, DTSC set the screening cleanup goal at 0.22 parts per million total PCBs. This value is an appropriate screening goal for a property that is to be used for residential purposes. However, the final decision regarding the adequacy of a cleanup is a risk assessment. Using the recent verification sampling results, DTSC conducted a risk assessment and determined that the risks levels were within applicable risk standards. In this case, DTSC used a statistical program that evaluates the estimated exposure over the entire site. This approach appropriately uses the upper bound (95% UCL) of the average concentration at the site.

Dot Lofstrom at DTSC said the two agencies' labs used different testing methods and got different results, which was a surprise to DTSC. Is this correct, and if so, how much did the results differ, and to what can that be attributed?

EPA took "split samples" with DTSC to ensure the quality of the data being used to make the risk determination. DTSC and EPA were fully aware that we were testing the soil with different methods. While we did not expect that there would be a significant difference in results, differences can arise from using different test methods. All of the EPA samples with quantifiable detections were above the levels detected in DTSC's analysis. This difference, in part, led us to conclude that additional investigation, using the test method EPA used, is appropriate.

The largest difference is approximately four times higher. We believe the difference can be attributed to differences in the test methods used.

Do EPA's results indicate a current public health risk from the site? Do they indicate that the earlier remediation was incomplete, or that more remediation is needed? Will EPA be doing additional testing, and if so, why? Also, when, and how much (how many samples)?

We do not believe that this site currently poses a significant risk to the community. EPA is working with DTSC to conduct additional sampling of the site. The new sampling will include over 144 sample locations and the samples will be analyzed using the test method EPA used on the first round. Once this data are collected, EPA or DTSC will conduct a risk analysis (as mentioned above) to determine if the property is suitable for residential development. If the

property is not suitable for residential development, we will request that that property owner conduct additional cleanup.

Let me know if anything here isn't clear, and also when someone might be available to speak by phone. Also, if you can get an answer to the first question ASAP, I would appreciate it.

Thanks,

Alicia

Alicia Robinson

Reporter

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